

EX PARTE OR LATE FILED

William Caton

From: Rodney Small
Sent: Tuesday, July 06, 2004 12:35 PM
To: William Caton
Subject: Written CableLabs Ex Parte Presentation of June 10,
To Bill Caton:

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Federal Communications Commission
Office of the Secretary

Please enter the written ex parte presentation of Cable Television Laboratories, Inc. to the Office of Engineering and Technology on June 10, 2004 into the record of RM-10865.

Thanks,

Rodney Small
FCC/OET

7/6/2004

History (1 of 5)

- 1999 - Development of LAES specification begins
 - Goal was to provide a Safe Harbor under CALEA for cable operators that choose to offer communication services using the PacketCable architecture
 - Contributors included vendor and cable operator technical community, and cable operator legal community
- Dec 29, 1999 - Version I01 is released
 - Defined the Electronic Surveillance architecture for PacketCable
 - Demarcation point, Delivery Function, Intercept Access Points (IAPs)
 - Specified basic capabilities to deliver call data and call content to LEA

History (2 of 5)

- June 2001 - FBI submits Engineering Change Requests (ECRs)
 - Nov 2001 - Electronic Surveillance focus team is reconvened
 - Telcordia Professional Services represented the FBI on the focus team
- August 15, 2003 - Version I02 is released
 - Focus team spent 18 months updating the specification:
 - addressed changes to the rest of the PacketCable specifications
 - resolved technical issues found in I01
 - added new capabilities requested by the FBI
 - Subject initiated signaling
 - Network initiated signaling

History (3 of 5)

- We received additional ECRs from the FBI shortly after I02 was released
 - Focus team continued to review open issues, and new ECRs
 - FBI transitioned consulting contract to Tridea Works
- Version I03 was released on January 13, 2004
 - Updates:
 - Fixed minor errors not caught in I02
 - Fully specify ASN.1 module for DF-CF interface
 - Added new capabilities requested by the FBI
 - Report IP-specific “call data” (components of SDP) to LEA for pen-register and trap-and-trace
 - 3-way calling information

History (4 of 5)

- May 18, 2004 CableLabs begins working with Tridea Works to address FBI's Dialed Digit Extraction Concerns
- May 23, 2004 Tridea Works presents CableLabs with a list of "deficiencies" in the PacketCable CALEA "Safe Harbor":
 1. Dialed digit extraction
 2. Party/Hold/Join/Drop (multi party calls)
 3. Timing Requirement for call content delivery/time-of-day stamp on call content packets
 4. Required reporting of call redirection of associates
 5. Limitation on number of codecs
 6. Required Calling_Party_ID delivery in TerminationAttempt Message
 7. Capture of database dips for 3 way calls
 8. Identification of Subject in NetworkSignal and SubjectSignal Messages

History (5 of 5)

Status of CableLabs' Progress in Meeting FBI's Deficiency List

- #3, #4, #6, #7, #8 - Easy changes
- #1 DDE – In progress
- #2 Party hold/join/drop – CableLabs believes this request was met. CableLabs and the FBI are working to determine what, if anything, must be added.
- #3 Timestamp on RTP packets – Proposed solution to add timestamp at the DF; FBI will provide feedback
- #5 Restricting Encryption Algorithms & Codecs – Discussed the possibility of transcoding as an alternative solution to restricting codec usage; FBI indicated this would be OK if there is no perceptible difference in sound quality. However, loss of quality (i.e. CD quality to PSTN quality) could be a problem. FBI to consult with the law enforcement community and provide additional feedback.
- Anticipate meeting all FBI concerns in specification by July 23,

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